

MAGGIANO, DIGIROLAMO, LIZZI & ROBERTS

TRIAL ATTORNEYS
A PROFESSIONAL CORPORATION

MICHAEL MAGGIANO*
NJ, NY BAR
CHRISTOPHER T. DIGIROLAMO
NJ BAR
MICHAEL LIZZI
NJ, NY BAR
KEITH J. ROBERTS
NJ, NY BAR

DANIEL C. LATERRA
NJ, NY BAR

ANTHONY J. SCIUTO
OF COUNSEL

201 COLUMBIA AVENUE
FORT LEE, NJ 07024
(201) 585-9111
FAX (201) 585-1646

624 NEWARK AVENUE
JERSEY CITY, NJ 07306
(201) 656-7222
FAX (201) 656-8448

521 FIFTH AVENUE
17TH FLOOR
NEW YORK, NY 10175
(212) 608-1600

85 KINDERKAMACK ROAD
EMERSON, NJ 07630
(201) 225-2550

E-MAIL:
Lawyers@MaggianoLaw.Com

*CERTIFIED BY THE SUPREME COURT
OF NEW JERSEY AS A CIVIL TRIAL
ATTORNEY
BOARD CERTIFIED, NATIONAL BOARD
OF TRIAL ADVOCACY

PLEASE REPLY TO THE FORT LEE, NEW JERSEY OFFICE

October 22, 2008

Honorable Peter G. Sheridan
United States District Court, District of New Jersey
M.L. King, Jr., Federal Bldg. & Cthse.
50 Walnut Street
Newark, New Jersey 07102

Re: Dzemali Kovacevec and Miliha Djinovic, wife v. Allan J. Wells, et al.
U.S.D.C. for the District of New Jersey, Newark Vicinage
Civil Action No.: 06-CV-925

Dear Judge Sheridan:

We have recently learned that a treating Neuropsychologist, Dr. John C. Friel of the New Jersey NeuroScience Institute has relocated to Santa Monica California. I have spoken to him and he is willing to participate as a trial witness for Plaintiff but can not fly to New Jersey because of his patient obligations. He states that he is willing to appear by Video Teleconference during the trial.

Please kindly advise if you would permit his testimony via this media. If permission is granted, please advise who we must consult with at the Federal Court to make appropriate arrangements for equipment and line connections for receipt and transmission.

*So Ordered
This application
must be made by
motion and
on notice to parties
Patricia
10/24/08*

Thank you for your kind attention.

Respectfully submitted,


Michael Maggiano

MM/lr

cc: Magistrate Esther Salas
Richard F. Connors, Jr., Esq.
Marc Pakrul, Esq.
Matthew Pisano, Esq.
Walter H. Swayze, III, Esq.
Nicholas J. Lombardi, Esq.
Mark Berard, Esq.
David M. Welt, Esq.
James Bride, Esq.